

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re

FIELDWOOD ENERGY LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 20-33948 (MI)

(Jointly Administered)

**CERTIFICATE OF COUNSEL TO PLAN ADMINISTRATOR'S FIFTH OMNIBUS
OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF
THE BANKRUPTCY CODE AND RULE 3007 OF THE FEDERAL RULES OF
BANKRUPTCY PROCEDURE SEEKING TO DISALLOW CERTAIN CLAIMS**
(Related Docket Nos. 2080 & 2150)

The undersigned hereby certifies as follows:

1. On October 6, 2021, the *Plan Administrator's Fifth Omnibus Objection To Claims Pursuant To Section 502(B) Of The Bankruptcy Code And Rule 3007 Of The Federal Rules Of Bankruptcy Procedure Seeking To Disallow Certain Claims* [Docket No. 2080] (the "Fifth Omnibus Objection") was filed with the Court by the administrator of the chapter 11 plan of the above-captioned reorganized debtors (the "Plan Administrator"). The deadline for parties to file a response to the Fifth Omnibus Objection was November 5, 2021 (the "Response Deadline").
2. On November 5, 2021, Melvin Sigure ("Signature") filed the *Response of Melvin Sigure to Fifth Omnibus Objection (Late Filed Claims)* [Docket No. 2150] with respect to Claim No. 957 filed by Sigure (the "Signature Claim"). Following discussions with counsel for Sigure, the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Plan Administrator has agreed to withdraw the Fifth Omnibus Objection solely with respect to the Sigure Claim, without prejudice to the Plan Administrator's right to refile an objection to the Sigure Claim at a later date.

3. Attached hereto as **Exhibit 1** is an amended proposed form of order (the "**Revised Proposed Order**") which withdraws the objection as to the Sigure Claim, and the undersigned is unaware of any further responses to the Fifth Omnibus Objection that were filed with the Court or otherwise made informally prior to the Response Deadline. A redline reflecting changes from the proposed form of order filed with the Fifth Omnibus Objection to the Revised Proposed Order is attached hereto as **Exhibit 2**.

Dated: November 30, 2021

Respectfully submitted,

/s/ Michael D. Warner

Michael D. Warner, Esq.

(TX Bar No. 00792304)

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Counsel for the Plan Administrator

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of November, 2021, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner

Michael D. Warner, Esq.